

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>IN RE: Vera D. Mcfarland Debtor(s) U.S. Bank National Association (Trustee for the Pennsylvania Housing Finance Agency, pursuant to a Trust Indenture dated as of April 1, 1982) Movant vs. Vera D. Mcfarland Debtor(s) Kenneth E. West Trustee</p>	<p>CHAPTER 13 NO. 20-11596 AMC 11 U.S.C. Section 362</p>
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**MOTION OF U.S. Bank National Association (Trustee for the Pennsylvania Housing Finance
Agency, pursuant to a Trust Indenture dated as of April 1, 1982)
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is U.S. Bank National Association (Trustee for the Pennsylvania Housing Finance Agency, pursuant to a Trust Indenture dated as of April 1, 1982).

2. Debtor(s) is/are the owner(s) of the premises 6153 Catharine Street, Philadelphia, PA 19143, hereinafter referred to as the mortgaged premises.

3. Movant is the holder of a mortgage, original principal amount of \$87,718.00 on the mortgaged premises that was executed on March 7, 2012. The mortgage has been assigned as follows:

Pennsylvania Housing Finance Agency ("PHFA") to U.S. Bank National Association (Trustee for the Pennsylvania Housing Finance Agency, pursuant to a Trust Indenture dated as of April 1, 1982) filed on November 15, 2013 at Document ID Number 52720241 in Philadelphia

4. Kenneth E. West, is the Trustee appointed by the Court.

5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).

6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$841.42 for the months of June 2021 through November 2021 and \$808.24 for the months of

December 2021 through February 2022 plus late charges if applicable. The debtor's suspense balance is \$68.04.

7. The total amount necessary to reinstate the loan post-petition is \$6,785.20.

8. Movant is entitled to relief from stay for cause.

9. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Rebecca A. Solarz, Esq.

Rebecca A. Solarz, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant